

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

| | | |
|----------------------|---|---------------------------------------|
| IN RE: |) | <u>IN PROCEEDINGS UNDER CHAPTER 7</u> |
| |) | |
| DEAN MAYNARD BOLAND, |) | CASE NO. 16-10250-jps |
| |) | |
| Debtor |) | U.S. BANKRUPTCY JUDGE |
| |) | JESSICA E. PRICE SMITH |

**NOTICE OF MOTION OF DEBTOR, DEAN MAYNARD BOLAND. TO AVOID
JUDGMENT LIEN OF JANE DOE AND JANE ROE
PURSUANT TO SECTION 522(f)(1)(A) OF THE BANKRUPTCY CODE**

TO: JANE DOE AND JANE ROE:

The Debtor has filed papers with the Court seeking avoiding a certain judgment lien held by you upon his residence.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then, **on or before March 23, 2016**, you or your attorney must:

File with the Court a written objection or response to the Motion, explaining your position, at:

Clerk of Court
United States Bankruptcy Court
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue, N.E.
Cleveland, Ohio 44114

If you mail your objection or response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail a copy to:

Stephen D. Hobt, Esq.
1370 Ontario Street, Suite 450
Cleveland, Ohio 44113-1744

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief. If a timely opposition is filed to the Motion, a hearing will be scheduled at the convenience of the Court.

Date: March 2, 2016.

/s/ Stephen D. Hobt

STEPHEN D. HOBT
(Ohio Bar Registration No. 0007681)
Attorney for Debtor
1370 Ontario Street, Suite 450
Cleveland, Ohio 44113-1744
(216) 771-4949
(216) 771-5353 (facsimile)
Email address: shobt@aol.com

SERVICE

I certify that, on March 2, 2016, a true and correct copy of the foregoing Notice of Motion to Avoid Judgment Lien was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Richard A. Baumgart, Esq., Chapter 7 Trustee, at baumgart_trustee@dsb-law.com.
Dov Frankel, Esq., on behalf of John W. Forrest, at dfrankel@taftlaw.com.

Jonathan E. Rosenbaum, Esq., on behalf of Jane Doe and Jane Roe, through Peter M. Lora and Victoria Bloom, at jerosenbaum@windstream.net.
Sheldon Stein, Esq., on behalf of Jane Doe and Jane Roe, through Peter M. Lora and Victoria Bloom, at ssteindocs@gmail.com.

And by certified U.S. mail, postage prepaid, on:

Jane Doe
c/o Peter Lora
15717 Clifton Boulevard
Lakewood, Ohio 44107

Jane Roe
c/o Victoria Bloom
10217 Unity Avenue
Cleveland, Ohio 44111

And by regular U.S. mail, postage prepaid, on:

Dean Maynard Boland
1440 Lewis Drive
Lakewood, Ohio 44107

Peter Lora
17506 Neff Road
Cleveland, Ohio 44119

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: March 2, 2016.

/s/ Stephen D. Hobt

STEPHEN D. HOBt
Attorney for Debtor